

United States District Court
For The District of Puerto Rico

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Docket Number:

CLERK'S OFFICE
U.S. DISTRICT COURT
SA 12864

claim #4809

Geovanny Ortiz

Perez

Plaintiff

V.

Commonwealth of

Puerto Rico and

others

Defendants et als.

Motion of Plaintiff Reply over Global objections.

To The Honorable United States District Judge
Laura Taylor Swain:

1. The present writ or notification has the purpose to advised the Puerto Rico oversight, management and Economic Stability Act, such as the Commonwealth of Puerto Rico that the fair cause that exist for the delay in the present case for not having answer within the term require of may 19, 2020, obey that the plaintiff on August 30, 2019 he was transfer from correctional facility of Guayama 1000 to the correctional facility 501 of Bayamon. Said the foregoing, the documents send by the Puerto Rico oversight, management and Economic Stability Act, to plaintiff were send to the prison of Guayama 1000, Guayama, Puerto Rico and today July 2, 2020, officer Rosado handed over said documents. For which, is humanly impossible that the plaintiff answer within the term required due that he did not have the knowledge of the Global objections pursuant to the causes of Title

III.

2. The Plaintiff establish very respectfully that he presented its lawsuit of civil action in joint with the chain of evidences to support his claims before the Puerto Rico First Instance Court, Superior Part of Guayama and to the Commonwealth of Puerto Rico with copy of the lawsuit and the evidences on caption case Geovanny Ortiz Perez VS. Commonwealth of Puerto Rico and others - civil no. GDP2017-0090; court room 301, over damages.
3. By another part, the plaintiff send copy of the civil lawsuit and evidences to the Puerto Rico oversight, management and Economic Stability Act, where requested the amount of fifty thousand dollars \$50.000.00 for mental anguishes and sufferings under color of law by abuse of power from part of correctional officers.
4. The Plaintiff understand that have a valid and meritorious claim for which should be monetary compensated and the Global objection alleged by the Puerto Rico oversight, management and Economic Stability Act, results to be unfair that only pretend to evade its duty to compensate the Plaintiff.

Prayer

Wherefore, the plaintiff very respectfully pray and request to the Honorable United States District Judge Laura Taylor Swain to grant the present writ in merits of all the above foregoing stated and in its consequences: 1.) take kno-

wledge of all the foregoing stated and resolve this claims in its merits taken into account that Plaintiff has requested fifty thousands dollars for all the damage suffered; 2.) the Plaintiff in prior time or before has send copy of the civil lawsuit and evidences to the Puerto Rico oversight, management and Economic stability Act and the common-wealth of Puerto Rico.

Very Respectfully Submitted In San Juan, Puerto Rico, on this date July 2, 2020.



Geovanny Ortiz Perez
Inst 501 of Bayamón, 2E
50 Carr. 5 Ind. Luchetti
Bayamón, PR 00961-7403

Certify

I hereby certify that a true and exact copy of the present writ has been send to the Legal Representation of the Puerto Rico oversight, management and Economic stability Act, on this same date, at the following address shown below.

C: Prime Clerk LLC
Grand central station
P.O. Box 4850
New York, NY 10163-4850